

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
FIELDWOOD ENERGY LLC, et al	§	Case No. 20-33948 (MI)
	§	
Debtors.	§	(Jointly Administered)

SECURED CREDITOR'S LIMITED OBJECTION TO PLAN

COMES NOW, Deepsea Quality Consulting, Inc. ("Deepsea) and files its Limited Objection to Debtor's Plan and its confirmation.

1. Deepsea filed a Notice of Lien Perfection (Doc. 352) on September 16, 2020 on three (3) rigs for \$109,415.11 including an administrative claim for \$30,440.53. Deepsea likewise filed its Proof of claim on October 27, 2020 (Claim 30) for the said unpaid claims.

2. Deepsea has been unable to obtain confirmation from Debtor that these claims will be paid or provided for payment in Debtor's Plan despite repeated request in writing to Debtor.

3. Deepsea has not been offered adequate protection for its secured claim.

WHEREFORE, Deepsea objects to Debtor's Plan and its confirmation.

Respectfully submitted,

COATS ROSE, P.C.

By: /s/Ben L. Aderholt
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Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2021, the electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept the Notice as Service of the attached document by electronic means.

/s/ Ben L. Aderholt

Ben L. Aderholt